

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

**IN RE JOHN LEWIS COAKE IV** § **Case No. 14-11220**  
§  
**Debtor** § **Chapter 7**  
§

**TRUSTEE'S RESPONSE IN SUPPORT OF THE MOTION TO EXPEDITE**

COMES NOW, Ron Satija, Chapter 7 Trustee ("Trustee") and files this *Response in Support of the Motion to Expedite* and would respectfully show as follows:

1. The Trustee admits paragraphs 1-5.

2. Paragraph 6 contains no allegations.

3. The Debtor gives no reasons why the hearing needs to be held prior to August 2 (e.g. how his rights or the condition of the property would be diminished by the later hearing date), and the Trustee would ordinarily ask that the Motion be denied. However the Debtor's allegation that the Trustee is out of town on that date is true.

4. Rather than file his own motion to continue as planned, the Trustee is not opposed to holding the hearing July 25<sup>th</sup> through 27<sup>th</sup> as Trustee's putative special counsel has indicated that a motion for bid procedures can be filed by then.

5. For the record, Mr. Achab has submitted an updated offer today which addresses the deficiencies raised by the Debtor. See attached Exhibit A. The offer is for \$11,000 for the Debtor's interest only, with no breakup fee. He is also open to further negotiation and/or conditions imposed by the Court. In any case, it is likely only a starting point as other parties have also expressed interest.

6. The dates requested by the Trustee are among the dates requested by the Debtor and therefore should be no hardship for the Debtor. The Trustee would, however, prefer the hearing not be held prior to those dates if at all possible for the Court.

WHEREFORE PREMISES CONSIDERED, the Chapter 7 Trustee respectfully requests that this Court grant the Motion with the Trustee's requested hearing dates and for such other and further relief to which he is entitled.

Respectfully submitted,

HAJJAR PETERS LLP

/s/ Ron Satija  
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PUTATIVE COUNSEL FOR THE  
CHAPTER 7 TRUSTEE

**CERTIFICATE OF SERVICE**

The signature above certifies that a true and correct copy of the foregoing document was served by CM/ECF or U.S. Mail within two business days of July 13, 2016, on those parties listed below.

/s/ Ron Satija  
Ron Satija

John Coake  
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By Mail

MICHAEL BAUMER  
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CM/ECF

US Trustee  
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Austin, TX 78701

By CM/ECF

